

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE: BRIDGET S. TAYLOR, { CHAPTER 13
{
{
DEBTOR(S) { CASE NO. A21-50289-PWB
{
{ JUDGE BONAPFEL

OBJECTION TO CONFIRMATION

COMES NOW Mary Ida Townson, TRUSTEE herein, and objects to Confirmation of the plan for the following reasons:

1. The Debtor(s)' payments under the proposed plan are not current.
2. The Debtor(s) has provided the Trustee with documentation that seems to provide evidence of the filing of the most recent year ending immediately before the commencement of the instant case. However, the documentation provided is not an actual return nor a transcript as required by 11 U.S.C. §521(e)(2)(A)(i).
3. The Debtor(s)' Statement of Financial Affairs is inaccurate and/or incomplete; the Trustee is unable to determine the feasibility of the proposed plan. 11 U.S.C. Section 1325(a)(6); specifically, question #27 omits location of businesses and dates of operation.
4. The 2016(b) Disclosure Statement and the Chapter 13 plan are inconsistent with regard to the attorney's fees received pre-petition or to be paid in the plan, or both, in violation of 11 U.S.C. Section 329 and Bankruptcy Rules 2016(b) and 2017; specifically, the amount to be paid if case is converted or dismissed.
5. The proposed plan fails to provide for the treatment of Midfirst Bank for arrears. However, said creditor has filed a secured/priority claim.

WHEREFORE, the Trustee moves the Court to inquire into the above objections, deny confirmation of this Debtor's(s') Plan and to dismiss the case; or, in the alternative, convert the case to one under Chapter 7.

February 25, 2021

/s

Sonya Buckley Gordon, Esq.
for Chapter 13 Trustee
GA Bar No. 140987

Mary Ida Townson, Chapter 13 Trustee
285 Peachtree Center Ave, Suite 1600
Atlanta, GA 30303
404-525-1110
Sonyab@atlch13tt.com

A21-50289-PWB

CERTIFICATE OF SERVICE

This is to certify that on this day I caused a copy of the foregoing pleading to be served via United States First Class Mail, with adequate postage thereon, on the following parties at the address shown for each:

DEBTOR(S):

BRIDGET S. TAYLOR
3947 VERACRUZ COURT
DECATUR, GA 30034

I further certify that I have on this day electronically filed the pleading using the Bankruptcy Court's Electronic Filing program, which sends a notice of this document and an accompanying link to this document to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing program:

BERRY & ASSOCIATES

This 25TH day of February, 2021

/s

Sonya Buckley Gordon, Esq.
for Chapter 13 Trustee
GA Bar No. 140987

Mary Ida Townson, Chapter 13 Trustee
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